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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

Gor Gevorkyan on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

Bitmain, Inc., Bitmain Technologies, Ltd.  
and DOES 1 to 10,

Defendants.

Case Number: 3:18-cv-07004-JD

**DECLARATION OF KARO  
KARAPETYAN IN SUPPORT OF  
PLAINTIFF'S SUPPLEMENTAL  
MEMORANDUM OF LAW IN  
OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS**

DECLARATION OF KARO KARAPETYAN IN SUPPORT OF PLAINTIFF'S  
SUPPLEMENTAL MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS

**DECLARATION OF KARO KARAPETYAN**

I, KARO KARAPETYAN, declare as follows:

1. I am a citizen of Los Angeles, California at all times relevant. I am acting counsel for the named Plaintiff, Gor Gevorkyan ("Plaintiff"). I make this declaration in support of Plaintiff's Supplemental Memorandum of Law in Opposition to Bitmain Technologies, Ltd.'s ("Bitmain HK") Motion to Dismiss. If called as a witness, I could and would testify competently to the following facts, all of which are within my own personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Transcript of December 19, 2019 Court Proceedings (Hearing Tr.).

3. Attached hereto as **Exhibit 2** is a true and correct copy of [REDACTED]  
[REDACTED] Conditionally filed herewith under seal.

4. Attached hereto as **Exhibit 3** is a true and correct copy of [REDACTED]  
[REDACTED] Conditionally filed herewith under seal.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a screenshot of a statement Bitmain HK posted on its blog at <https://blog.bitmain.com.https://blog.bitmain.com/en/fraudulent-use-of-bitmain-brand-by-bitmain-farm-and-antminersmining-com/> (last visited June 11, 2020).

6. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot of Bitmain Support webpage which can be found at <https://service.bitmain.com/support>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a screenshot of Bitmain HK's "Contact Us" Webpage which can be found at <https://www.bitmain.com/contact> (last visited June 11, 2020).

8. Attached hereto as **Exhibit 7** is a true and correct copy of a job posting from Bitmain HK for Sales Specialists in San Jose, California, found on Bitmain HK's LinkedIn page which can be found at <https://www.linkedin.com/jobs/view/sales-specialist-at-bitmain-962990492/> (last visited June 11, 2020).



1           9. Attached hereto as **Exhibit 8** is a true and correct copy of a screenshot of Bitmain  
2 HK's official YouTube Channel webpage which can be found at

3 <https://www.youtube.com/channel/UCrjWmBeM0ezBsrPiHvUoeag:>

4 <https://www.youtube.com/channel/UCrjWmBeM0ezBsrPiHvUoeag/about>; and

5 [https://www.youtube.com/watch?v=Xaa\\_-jQ4NvM](https://www.youtube.com/watch?v=Xaa_-jQ4NvM) (last visited June 11, 2020).

6           10. Attached hereto as **Exhibit 9** is a true and correct copy of [REDACTED]

7 [REDACTED] Conditionally filed herewith under seal.

8           11. Attached hereto as **Exhibit 10** is a true and correct copy of an [REDACTED]

9 [REDACTED] Conditionally filed herewith  
10 under seal.

11           12. Attached hereto as **Exhibit 11** is a true and correct copy of a Silicon Valley  
12 Business Journal news article published on June 16, 2018 titled: "Exclusive: Chinese  
13 cryptocurrency giant fills last vacancy in downtown San Jose office tower." which can be found  
14 on [https://www.bizjournals.com/sanjose/news/2018/07/16/bitmain-technologies-san-jose-office-](https://www.bizjournals.com/sanjose/news/2018/07/16/bitmain-technologies-san-jose-office-riverpark.html)  
15 [riverpark.html](https://www.bizjournals.com/sanjose/news/2018/07/16/bitmain-technologies-san-jose-office-riverpark.html) (Last visited June 11, 2020).

16           13. Attached hereto as **Exhibit 12** is a true and correct copy of portions of Bitmain  
17 Technologies Holding Company's IPO prospectus, including an Organizational Chart.

18           14. Attached hereto as **Exhibit 13** is a true and correct copy of a [REDACTED]

19 [REDACTED] Conditionally filed herewith under seal.

20           15. Attached hereto as **Exhibit 14** is a true and correct copy of a screenshot of State  
21 of Delaware Division of Corporations – Filings (Last visited June 11, 2020).

22           16. Attached hereto as **Exhibit 15** is a true and correct copy of the job posting by  
23 Bitmain HK on the Indeed.com website.

24           17. Attached hereto as **Exhibit 16** is a true and correct copy of an [REDACTED]

25 [REDACTED] Conditionally filed  
26 herewith under seal.

27           18. Attached hereto as **Exhibit 17** is a true and correct copy of the Declaration of  
28 Luyao Liu in litigation in the Southern District of Florida.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and that this Declaration was executed on this 11<sup>th</sup> day of June 2020, in Los Angeles, CA.

**KARO KARAPETYAN**